



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street  
San Francisco, CA 94105-3901

December 7, 1994

Juris Sinats  
Environmental Restoration Branch, Code 181  
EFA, West  
Naval Facilities Engineering Command  
900 Commodore Drive  
San Bruno, CA 94066-0720

Re: Removal Work Plan and Action Memorandum for the Proposed  
Time Critical Removal Action for the Concord Annex Disposal  
Area, Site IR-5, Draft

Dear Mr. Sinats:

The above referenced document has been reviewed and comments are enclosed. The removal includes a number of aspects that need to be better addressed in the documents. I suggest that we have a meeting to clarify the enclosed concerns.

If you have any questions, please call me at 415/744-2388.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Huettelman", is written over a horizontal line.

Tom Huettelman  
Remedial Project Manager

cc: Dick Logar, MINSY  
Bob Pender, MINSY  
Marvin Hillstom, EFA West  
Chip Gribble, DTSC  
Gina Kathuria, RWQCB



1. The Action Memorandum does not follow USEPA guidance and is not consistent with other Action Memos from the shipyard. The memo should be revised to meet the guidance and needs to include all required elements such as ARARs which have not been addressed.

#### Work Plan Comments

2. Section 4: This section should clearly distinguish the purpose of removing the buried UXO masses from the purpose of removing UXO from the top 6 to 12 inches of soil. Will these activities truly remove all ordnance from IR-5 or only the ordnance that is most likely to pose a safety risk? Please also indicate whether the removal is specifically intended to address environmental contamination that is not specifically a safety concern or is it the intent to primarily address the safety concerns only? Since the site was a disposal area it would seem that the areas that contain ordnance are not necessarily the areas that are contaminated with chemical residuals from the disposal practices.

3. Page 5: Groundwater samples within the excavation pits should be sampled for a complete list of potential chemicals of concern to evaluate how groundwater in the immediate vicinity of the pits may or may not have been impacted. These samples and analyses should be performed through PRC so that data quality can be consistent with the remedial investigation data. This type of analysis does not necessarily need to be done more than once per pit.

#### 4. Section 5.5:

a. Provide more specifics on the surface screening method. How small a size ordnance will be screened out?

b. What is the rationale for screening the top 6 to 12 inches of soil? How was this depth determined? If the depth is intended to provide a safety margin free of ordnance, then wouldn't the cleaned soil have to be returned to the site from where it came?

c. Over what specific areas will this removal be conducted? Are some of these areas wetlands habitat and if so has the U.S. Fish and Wildlife Service and State Fish and Game been consulted?

5. Section 5.7, Page 7: The statement that the excavated soil will be considered part of a soils Corrective Action Management Unit should not apply here if the soil is kept within the area of contamination. This issue needs to be addressed in an ARARs analysis as part of the Action Memo.



6. Section 5.11: Provide more detail on the ordnance disposal method and include the approved Standard Operating Procedure. Does the disposal facility meet RCRA requires for a miscellaneous unit for open detonation?

7. Section 5.13: What non-ordnance hazardous materials might be present? Specify any chemicals of potential concern.

8. Section 7: This section should be more focused. The following questions must be specifically addressed: (1) The method or methods for restoring the pits; (2) the method or methods for restoring the areas that were surface cleared--do these areas even need any restoration and why might they?; (3) the final disposition of the excavated soil as part of this removal. For each of these three concerns discuss the factors that will be evaluated, the method for reaching a decision and a timeline. For item number 1, for example, there are probably only two real choices: Either fill in the pits with clean soil or use the previously excavated soil. The decision may depend on contaminants in the soil.

#### Field Sampling Plan

1. See Comment 1 for the QAPP.

2. Section 1: Data for the last objective should be part of the remedial investigation (RI). Data should be analyzed using laboratory QC procedures consistent with the RI and the data should be funneled through PRC for validation and addition to the RI data base.

3. Section 4:

a. What is the sampling design for the excavation face, groundwater, surface face, and scrape samples? Will all these be composite samples?

b. I commend the Navy for using the statistical approach mentioned here. However, for purposes of waste disposal the sample numbers are very high. The acceptable error bars should be reconsidered; also the sample variability is expected to be lower than that measured by PRC because of the compositing and the homogenization in the stockpiles. The number of water samples are much higher than necessary. What is the basis for this number? Groundwater once collected into a baker tank should homogenize well so that one or two samples per full tank are probably enough.

c. Please provide the referenced pages for reference 2, page 11. Does this procedure factor in the effect of compositing, which should reduce the number of required samples?

- d. What were the regulatory thresholds referred to on page 11?
4. Table 5.1: See Comments for the QAPP regarding analytical procedures. This table includes a number of unexplained inconsistencies between different media. For example, the method of pesticides and PCBs is listed here for water but is not labeled and is not listed for soil. Also, the quantity of sample specified for the organic analyses are generally twice what is normally required.
5. Section 6.1:
- a. What is the procedure for locating and documenting the locations of soil samples from the different areas, especially the surface and excavation face samples.
- b. Clearly specify the number of subsamples that make up each composite sample.
- c. What is the sample collection method for groundwater in the pits and tanks? What are the analytes specified for the sewer system? Are they in table 5.1? The plan needs to clarify what analyses will be performed for water.
- d. Why are surface samples being collected from 6 to 18 inches?
- e. What type of material is expected to be scrap? Metal scrap maybe should be cleaned and recycled.
6. Section 6.3: For oily or sludge contaminated equipment, the initial water rinse should include scrubbing the equipment.
7. Section 6.5: The exact methods for sample preservation and filtering need to be described.
8. Section 6.8: EPA recommends duplicates for soil. With the sampling methods described here, representative duplicate samples can be collected. For discrete sampling, the duplicates also give an indication of the degree of heterogeneity of the contamination which is useful for evaluating the representativeness of the sampling effort.

#### QA Project Plan

1. Signature Page: The QA Program Manager does not match figure 2-1.
2. Section 3.1.3: Representativeness can be considered more quantitatively in determining the appropriate number of samples necessary to characterize an area or population with certain variability and distribution within the population.



3. Section 3.2: The detection limits should be evaluated against applicable action levels or risk levels to determine if they are low enough to meet the project objectives.
4. Table 3-1: Why is some information missing from the table?
5. Table 3-2: The units for soil are in error. It would appear that the soil column includes limits that are ppb and ppm. For petroleum hydrocarbons are the limits the same regardless of whether the measurement is for the purgeable or the extractable portion? Also, the table does not include methods 8330 or 7060 and does not include all compounds from Table 3-1. The title of this table should indicate that it is only for organic chemicals.
6. Tables 3-1 through 3-3: These tables are not consistent with data requirements for the remedial investigation. The target chemicals and detection limits are different. PRC's revised QAPP appendices dated 12/31/94 should be reviewed. Ultimately it depends on the uses of the data as to what is required.
7. Table 4-1: Please verify the need for  $\text{Na}_2\text{S}_2\text{O}_3$ . Also, why is 8330 only listed under soils and 7060 only under water.
8. Section 8.1: Why does this only discuss metals? All methods should be discussed. Also, applicable method references for atomic absorption should be included. Please note that mercury is not analyzed for using method 6010.
9. Table 8-1: Where is method 8330? Why are herbicides included here and not in other applicable tables or text? Method 6010 is for ICP only.
10. Table 9-1: Why is pesticides not an analysis listed here when it is listed in other tables. The number of blanks listed here implies that all samples will be collected in one day. All tables need to be checked for consistency and completeness.
11. Section 9.3.2: The additional volume of water required for the MS/MSD needs to be specified.
12. Section 10.2.2: Who will perform the data validation discussed here? This effort requires an experienced analytical chemist. What qualifiers will be used? These need to be defined in the document. Is the data validation going to be an independent validation from checks performed by the laboratory? How will the results of the data validation be reported?
13. Section 10.3.2: Laboratory data must be reported with any appropriate qualifiers.
14. References: A 1987 EPA reference in the document is not included.